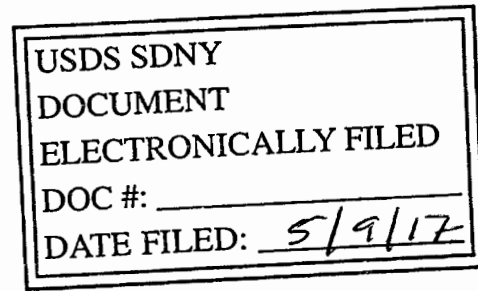
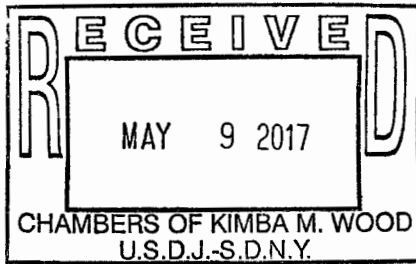


MEMO ENDORSED



May 8, 2017

VIA ECF, E-Mail and Hand Delivery

Honorable Kimba M. Wood
Senior United States District Judge
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. David Williams, Steven Brown, Gerald Seppala.*
Docket No. S3 16 Cr. 436 (KMW)

**Letter Application Seeking The Court's Permission
For Defendant Steven Brown To Travel
To The Cannes Film Festival For Business Purposes**

Dear Judge Wood:

I write again as the attorney for defendant Steven J. Brown to seek the Court's permission for Mr. Brown to travel to France to attend The Cannes Film Festival from approximately May 20 until May 26, 2017.

Granted
KMW

As in his past international business travel, his continuing purpose would be to engage in prospective and other media film business transactions and set conditions and terms in face to face meetings with executives, producers and other representatives of the media represented. This international travel is essential to Mr. Brown's continuing business.

I rely on the statements in my prior letters to the Court regarding this topic for the reasoning behind the importance of Mr. Brown's travel to major international film festivals.

Honorable Kimba M. Wood

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May 8, 2017

I have again communicated with Assistant United States Attorney Patrick Egan to seek the government's consent to this travel but without success, as I do know he has been very busy; however, I must presume that he will maintain the government's objection to my client's international travel as a flight risk.

Also and accordingly, I cannot represent that he will not file a separate letter opposing my request for this international travel. Now as before, I have also communicated with Mr. Brown's Pretrial Services Officer, Mr. Matthew Carter. Pretrial Services takes no position on international travel but does note again for both AUSA Egan and myself that Mr. Brown has always honored his commitments to Officer Carter and his Office. I stand by to supplement this letter should the court wish.

Thank you again for your consideration of this and my prior international travel requests.

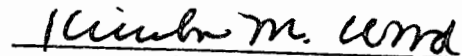
Respectfully submitted,



Walter Mack

cc: AUSA Patrick Egan (by ECF and email)
PTSO Matthew Carter (by email)
PTSO Natasha Ramesar (by email)

SO ORDERED: 5/9/17



KIMBA M. WOOD
U. S. D. J.